

# GODWIN ♦ HURLEY ♦ DONOGHUE LLP

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October 13, 2017

**via ECF**

Hon. Christina Clair Reiss  
U.S.D.C. for the Western District of New York  
2 Niagara Square  
Buffalo, New York 14202-3350

Re: Curione v. Wal-Mart Stores East, LP et al  
Case Number: 1:17-cv-00497-CCR

Dear Judge Reiss:

I am writing to request that the Court schedule a Rule 16(b) conference to put in place the Discovery Plan for the subject action.

Respectfully submitted,

*s/ Patrick J. Donoghue*

Patrick J. Donoghue, Esq.

kk